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February 14, 2025

Via ECF

Hon. Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Morgan, et al. v. City of New York, 23-cv-1079 (NRB)

Dear Judge Buchwald:

This firm represents Plaintiffs Anthony Morgan and David Nieves in this case. Pursuant to the Court's October 23, 2023 Order (ECF No. 24), we write jointly with all Defendants to provide the Court with a status update.

Pursuant to the parties' telephone conference with the Court on January 28, 2025, Plaintiffs sent a letter to the City Defendants on February 7, 2025 outlining Plaintiffs' position with respect to all outstanding individual defendant fact discovery issues as well as certain items that Plaintiffs believe should be addressed during *Monell* discovery. Plaintiffs asked the City Defendants to respond by February 21, 2025.

City Defendants have received Plaintiffs' letter and will respond accordingly. Also pursuant to the January 28, 2025 telephone conference with the Court, City Defendants are still waiting for Plaintiffs to respond to their outstanding demands dated January 7, 2025, as directed by the Court. Plaintiffs intend to respond to the City Defendants' January 7, 2025 requests.

If any disputes arise based on the parties' responses to each other's respective demands, the parties will attempt to resolve them and will alert the Court promptly as to whether

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

Page 2

any disputes require the Court's intervention or whether the parties are prepared for the Court to schedule a conference to discuss settlement and *Monell* discovery.

The parties thank the Court for its time and consideration.

Sincerely,

/s

Emily Wanger

c. All parties via ECF